

THE HONORABLE RICARDO S. MARTINEZ

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

MARGARET HERNANDEZ,

Plaintiff,

vs.

SAFEWAY, INC., a foreign corporation  
doing business in the State of Washington,

Defendant.

No. 3:21-cv-05023-RSM

STIPULATION FOR AND ORDER  
OF DISMISSAL

**I. STIPULATION**

IT IS HEREBY STIPULATED AND AGREED by and between the parties as follows:

1. Plaintiff agrees to dismissal of her claims against the defendant with prejudice and without costs to either party.

2. Defendant agrees to immediately, upon receipt of Plaintiff's counsel's signature on this stipulation, stop medical records collection that is currently in process pursuant to a January 7, 2021, stipulation between the parties in this matter and provide to Plaintiff's counsel the records obtained pursuant to this stipulation without retaining a copy.

STIPULATION FOR AND ORDER OF  
DISMISSAL - 1

R:\6916\PLEADINGS\dismissal.stip.wpd



Turner Kugler Law, PLLC

6523 California Ave SW #454  
Seattle, WA 98136  
(206) 659-0679

3. The parties jointly request that the court enter the subjoined order of dismissal. The parties waive notice of presentment.

Dated: January 20, 2021.

GS JONES LAW GROUP, P.S.

TURNER KUGLER LAW, PLLC

By: s/ John D. Groseclose  
John D. Groseclose, WSBA #29104  
Attorney for Plaintiff

By: s/ John T. Kugler  
John T. Kugler, WSBA # 19960  
Attorney for Defendant

## II. ORDER

THIS MATTER came before the court based on the foregoing stipulation of the parties for dismissal. It is hereby ORDERED, ADJUDGED AND DECREED that the above-entitled matter be and the same is hereby dismissed with prejudice and without costs.

Dated: January 22, 2021.



Ricardo S. Martinez  
Chief United States District Judge

PRESENTED BY:

TURNER KUGLER LAW, PLLC

By: s/ John T. Kugler  
John T. Kugler, WSBA # 19960  
Attorney for Defendant



**CERTIFICATE OF SERVICE**

I hereby certify that on January 21, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Attorney for Plaintiff:

John Groseclose  
GSJones Law Group  
1155 Bethel Ave.  
Port Orchard, WA 98366  
[john@gsjoneslaw.com](mailto:john@gsjoneslaw.com)

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

none

s/ John T. Kugler

JOHN T. KUGLER, WSB #19960  
Attorney for Defendant Safeway Inc.  
TURNER KUGLER LAW, PLLC  
6523 California Ave SW #454  
Seattle, WA 98136-1833  
Telephone: (206) 659-0679  
E-mail: [john@turnerkuglerlaw.com](mailto:john@turnerkuglerlaw.com)

